

Division of Air and Water Quality
Air Quality Maintenance Section
410 Willoughby Avenue, Suite 105
Juneau, Alaska 99801-1795

Phone: (907) 465-5100
Fax: (907) 465-5128

December 16, 1997

Lt. Cmdr. Mark Frost
Commanding Officer
PO Box 19500
Kodiak, Alaska 99619

Re: Notification of final decision to approve, Owner Requested Limit ORL 000093
U.S. Coast Guard Integrated Support Command (ISC) Kodiak

Dear Lt. Cmdr. Frost:

The Department received your application on October 20, 1997, seeking an owner requested limit for the USCG ISC Kodiak facility. Based on the supplied information and your notarized certification, and a finding that your request met the requirements 18 AAC 50.225(b), the Department made a preliminary decision to approve your request for an owner requested limit. The Department conducted a 30 day public comment period from November 10 to December 10 to solicit comments and testimony on the proposed limit. One comment letter was recieved. Several comments were editorial in nature, and were incorporated into the final ORL. Two comments requested changing the reporting period to the calendar year, and to change the compliance certification to March 1 of each year. These have been changed in the final ORL. One comment requesting deletion of the requirement to list the fuel sulfur testing or fuel grade. This was not incorporated into the final ORL, since the requirement to document fuel sulfur content (or fuel grade if less than 0.5% Sulfur) confirms compliance with annual SO₂ limits.

Enclosed is the final approval of your Owner Requested Limit. After you have provided your notarized signature accepting the conditions on Page 1 of the ORL, return that page (only) for Department concurrence. The limit will take effect one day after we receive the letter with your notarized signature. We will then mail back the final Page 1.

If the Department subsequently approves the limit, a copy of that notification will be sent to you. After you have provided your notarized signature accepting the conditions, return the approval for Department concurrence. The limit will take effect one day after we receive the letter with your notarized signature.

You are also reminded that although this limit applies only for the purpose of determining the facility's potential emissions specific to fuel use at the facility, fuel use in the internal combustion engines, and fuel loading at the facility. You are not relieved of compliance with applicable emission standards for fuel burning equipment or general prohibitions that apply to your facility. This includes the opacity, particulate matter, and sulfur dioxide standards in 18 AAC 50.055(a-c), and the prohibitions of 18 AAC 50.045, 18 AAC 50.065 (open burning) and 18 AAC 50.110. However, there are no explicit terms in this limit requiring monitoring, recordkeeping and reporting for these standards and prohibitions.

Please note that there are 10 conditions of the approved limit. Condition 1 limits fuel consumption in the external combustion sources, and Condition 2 allows blending of used oil with JP-2 or diesel. Condition 3 limits fuel consumption in the internal combustion engines and generators. Condition 4 limits the total use of coating, solvents and thinners/reducers. Condition 5 limits total gasoline throughput for all fuel dispensing sources. Condition 6 limits fuel sulfur content of the liquid fuel. These conditions are imposed to assure that the potential emissions of NO_x, CO, and SO₂ do not exceed 100 tons per year.

This is a final permit action for purposes of review under AS 46.14.200. A person who has a private, substantive, legally protected interest under state law that may be adversely affected by the permit action, the owner and operator, or a person who participated in the public comment process may request an adjudicatory hearing under 18 AAC 15.200-910. The request should be mailed to the Commissioner, Alaska Department of Environmental Conservation, 410 Willoughby Avenue, Suite 105, Juneau, Alaska 99801-1795, by certified mail, return receipt requested. A copy of the request shall also be sent to the undersigned. The right to administrative review will be waived if no request for an adjudicatory hearing is served within 30 days of the date of this letter. Any hearing granted will be limited to issues related to the issuance of this Owner Requested Limit approval. If an adjudicatory hearing is thereafter granted, all ORL conditions remain in full force and effect.

Should you have questions regarding this action or other related matters, please contact Alfred Bohn at (907) 269-7584.

Sincerely,

John M. Stone, P.E.
Chief, Air Quality Maintenance Section

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cc: (File Copy), AQM/Anchorage
(File Copy), AQM/Juneau

Lt. Cmdr. Frost
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December 16, 1997

(File Copy), AQM/Fairbanks
Bill Hedgebeth, USEPA Region X
John Pavitt, USEPA Alaska
Judy Nottoli, 10389 Old Placerville Rd., Sacramento CA 95827

State of Alaska - Air Quality Maintenance Section
Owner Requested Limit

FACILITY IDENTIFICATION

No. ORL 000093

Owner/Operator: Commanding Officer
Facility Name: USCG Integrated Support Command Kodiak
Facility Address: USCG Base, Kodiak P.O. Box 19500
City, State, Zip: Kodiak, Alaska 99619

Latitude/Longitude: 57° North, 152° West

Facility Contact: Lt. Cmdr. Mark Frost
Phone Number: (907) 487-5180 Ext. 121

The above named owner/operator has submitted a complete application for an owner requested limit under 18 AAC 50.225(b) for the USCG Integrated Support Command Kodiak facility. The Department grants an owner-requested limit to restrict the potential to emit of the facility such that an operating permit is not needed due to being classified under 18 AAC 50.325(b)(1). The Department certifies that the owner requested limit is effective as of the date noted below.

In accordance with 18 AAC 50.225(f), the applicant has agreed to the conditions listed on the following pages.

The owner or operator may revise this limit under 18 AAC 50.225(h) by submitting a new request under 18 AAC 50.225(b). This limit remains in effect until the revision is approved. The owner or operator may terminate this limit according to the procedures of 18 AAC 50.225(h).

I understand and agree to the terms and conditions of this approval.

Owner or Operator

Printed Name

Title: _____

This certifies that on _____, the person named above appeared before me, a notary public in _____ and for the State of _____, and signed the above statement in my presence.

Notary Signature & Seal _____
My commission expires _____

Department approval:

Air Quality Maintenance Issuing Officer

Limit Effective Date

CONDITIONS

1. The owner/operator shall limit fuel consumption in the sources listed in Table 1 to no more than a cumulative total of 2,600,000 gallons of JP-5 fuel and diesel fuel in any combination, and used oil blend, in any 12 month period.
2. The owner operator may blend used oil with virgin distillate fuels for use in the sources in Table 1 at a blended ratio not exceed 25% used oil by volume. No used oil exceeding the specification levels described in 40 CFR 279.11 Table 1 shall be burned at the facility.
3. The owner/operator shall limit the fuel consumption in the internal combustion engines and generators listed in Table 2 to no more than a cumulative total of 100,000 gallons of diesel fuel in any 12 month period.
4. The owner/operator shall limit the total use of coating, solvents and thinners/reducers in the sources listed in Table 3 to no more than a cumulative total of 6,000 gallons in any 12 month period.
5. The owner/operator shall limit the total gasoline throughput for all fuel dispensing sources listed in Table 4 to no more than a cumulative total of 2,000,000 gallons of gasoline in any 12 month period.
6. The owner/operator shall ensure that fuel sulfur content of the liquid fuel burned at the facility does not exceed 0.50% by weight.
7. The owner/operator shall conduct monitoring related to the conditions established in this limit, in accordance with the following:
 - (A) For condition 1, measure and record the quantity of JP-5, diesel fuel, and used oil combusted in the sources listed in Table 1, monthly;
 - (B) For condition 2, conduct analytical analysis of representative samples of the unblended used oil at least once every six months;
 - (C) For condition 3, measure and record the aggregate total quantity of fuel combusted in the internal combustion engines and generators listed in Table 2, monthly;
 - (D) For condition 4, measure and record the quantity of coating, solvents and thinners/reducers used in the sources listed in Table 3, monthly;
 - (E) For condition 5, measure and record the quantity of gasoline dispensed from the sources listed in Table 4, monthly;
 - (F) For condition 6, obtain the percent sulfur by weight, as determined by ASTM approved

test methods, for each fuel shipment that is used in sources at the facility. If the grade of fuel requires 0.50% sulfur by weight or less, the owner/operator shall obtain a record from the shipper that specifies the grade of fuel.

8. The owner/operator shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of collection. Support information includes fuel delivery or fuel use records, calibrations for fuel monitoring instrumentation, and copies of reports and certifications required by this approval. In addition, the owner/operator shall keep specific records as follows:
 - (A) Keep records of the quantity of JP-5, diesel fuel and used oil burned in the sources listed in Table 1 by month;
 - (B) Keep records of any used oil analytical analysis;
 - (C) Keep records of the aggregate total quantity of diesel fuel burned in the internal combustion engines and diesel generators listed in Table 2 by month;
 - (D) Keep records of the quantity of coating, solvents and thinners/reducers used in the sources listed in Table 3 by month;
 - (E) Keep records of the quantity of gasoline dispensed from the sources listed in Table 4 by month;
 - (F) Keep copies of fuel delivery records that specifies the grade of fuel used in sources at the facility; and
 - (G) Keep copies of reports and certifications required by this approval.
9. The owner/operator shall submit three copies of an annual compliance report to the Alaska Department of Environmental Conservation, Air Quality Maintenance Section, 410 Willoughby Ave, Juneau, Alaska 99801-1795. The report is due by **March 1** for information from the period January 1 through December 31, beginning March 1, 1999. The reports are to contain:
 - (A) The name of the owner/operator, the facility name, ORL number and the period of the report;
 - (B) a listing of the JP-5, diesel fuel, and used oil consumed in the sources listed in Table 1 for the past 12 months, by month;
 - (C) a listing of the aggregate total fuel consumption of all diesel generators listed in Table 2 for the past 12 months, by month;
 - (D) a listing of the quantity of coating, solvents and thinners/reducers used by the sources listed in Table 3 for the past 12 months, by month;
 - (E) a listing of the quantity of gasoline dispensed from the sources listed in Table 4 for the past 12 months, by month;
 - (F) a listing of the sulfur content, fuel sulfur testing results, or the fuel grade of each fuel shipment used in sources at the facility;

- (G) a listing of the results of any used oil analytical analysis;
- (H) The reports must clearly identify any deviation from the limit requirements; and
- (I) A certification of report information, signed by the Responsible Official defined in 18 AAC 50.990(77), using the format of 18 AAC 50.205.

10. The owner/operator shall certify compliance annually by March 1 of each year for the period from July 1 to June 30 of the previous year in accordance with the format specified in 18 AAC 50.205, beginning on March 1, 1999. The owner/operator shall submit two copies and the original of the annual certification of compliance to the Alaska Department of Environmental Conservation, Air Quality Maintenance Section, 410 Willoughby Ave., Juneau, Alaska, 99801-1795, and send one copy to EPA, 1200 6th Ave. mailstop OAQ-107, Seattle, WA 98101.

Statement of Avoided Requirement :

The potential to emit of the sources listed in Tables 1, 2, 3, and 4 for any one regulated air contaminant is reduced to less than 100 tons per year by limiting the fuel consumed in the sources, limiting the sulfur content of the fuel to no greater than 0.50% by weight, limiting the quantity of coating, solvents and thinners/reducers, and limiting the amount of gasoline dispensed in any 12 month period. In accordance with 18 AAC 50.210, the capacity of the facility to emit an air contaminant is verifiable through the monitoring, recordkeeping, and reporting contained in this approval. By limiting the potential to emit of the sources listed in Tables 1, 2, 3, and 4, the owner/operator is avoiding the requirement to obtain an operating permit for a facility that is classified under AS 46.14.130(b) and 18 AAC 50.325(b)(1).

Table 1
External Combustion Device Inventory Subject to Limit

<u>Description</u>	<u>Building</u>	<u>Mfg. / Model. No.</u>	<u>Rated Capacity</u>	<u>Fuel</u>
Oil-Fired Boiler # 1	Steam Plant	Cleaver Brooks	32.6 MMBtu/hr	JP-5/Diesel #2
Oil-Fired Boiler # 2	Steam Plant	Cleaver Brooks	32.6 MMBtu/hr	JP-5/Diesel #2
Oil-Fired Boiler # 3	Steam Plant	Cleaver Brooks	32.6 MMBtu/hr	JP-5/Diesel #2
Oil-Fired Boiler # 4	Steam Plant	Cleaver Brooks	32.6 MMBtu/hr	JP-5/Diesel #2
Oil-Fired Boiler	Auto Hobby	Kewanee	5.02 MMBtu/hr	Diesel #2
Oil-Fired Boiler # 1	Bldg. 15	Cleaver Brooks	2.10 MMBtu/hr	Diesel #2
Oil-Fired Boiler # 2	Bldg. 15	Cleaver Brooks	2.10 MMBtu/hr	Diesel #2
Oil-Fired Boiler # 3	Bldg. 15	Cleaver Brooks	2.10 MMBtu/hr	Diesel #2

Table 2
Internal Combustion Engine and Generator Inventory Subject to Limit

<u>Description</u>	<u>Building</u>	<u>Mfg. / Model. No.</u>	<u>Rated Capacity</u>
Diesel generator	Hangar 3	Cat D370 B	300 kW
Diesel generator	Hangar 3	Onan	500 kW
Diesel generator	Hangar 3	GM	060 kW
Diesel generator	Hangar 3	GM	100 kW
Diesel generator	Hangar 3	Lister	008 kW
Diesel generator	Hangar 3	Onan	275 kW
Diesel generator	Heavy Equipment	Onan	300 kW
Diesel generator	Heavy Equipment	Onan	150 kW
Diesel generator	Heavy Equipment	Onan	050 kW
Diesel generator	A/S Coms	U/K	050 kW
Diesel generator	ESU	John Deere	150 kW
Diesel generator	Nemetz Lift Station	Onan	030 kW
Diesel generator	Wastewater Trtmt.	Cummins	175 kW
Diesel generator	Steam Plant	Onan	550 kW
Diesel generator	Administration	Kohler	080 kW
Diesel generator	Medical/Dental	Onan	250 kW
Diesel generator	Medical/Dental	John Deere	050 kW
Diesel generator	Golf Course	Onan	030 kW
Diesel generator	Golf Course	N. Lights	012 kW
Diesel generator	Fire House	John Deere	100 kW

Conditions for Owner Requested Limit
USCG Integrated Support Command Kodiak

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Diesel Generator	Commsta	Caterpillar	550 kW
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Table 2 (continued)
Internal Combustion Engine and Generator Inventory Subject to Limit

AGE Diesel Generators - Air Station Portable

<u>Description</u>	<u>Mfg. / Model. No.</u>	<u>Rated Capacity</u>
Diesel generator	Essex/A934C	102 hp
Diesel generator	Hobart/60G20P	106 hp
Diesel generator	Hobart/60G20P	106 hp
Diesel generator	Hobart/60G20P	106 hp
Diesel generator	Hobart/60G20P	106 hp
Diesel generator	Hobart/6T28-400CL	148 hp
Diesel generator	Essex/A934C	102 hp
Diesel generator	Essex/A934C	102 hp
Diesel generator	Essex/A934C	102 hp
Diesel generator	Essex/A934C	102 hp

Table 3
Surface Coating/Painting Inventory Subject to Limit

<u>Description</u>	<u>Location</u>
Paint Booth	Auto Hobby Shop Bldg. 614
Paint Booth	Hangar #2 Bldg. 20
Paint Booth	Motor Pool Bldg. N-1

Table 4
Fuel Dispensing Sources Inventory Subject to Limit

<u>Description</u>	<u>AST Tanks</u>	<u>Nozzles</u>
Consolidated Service Station (gasoline dispensing)	2	2
Consolidated Service Station (diesel dispensing)	1	1